

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

FILED IN OPEN COURT
ON 2-12-2020
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC
JRA

NO. 7:20-CR-20-180(3)
NO. 7:20-CR-20-280(3)

UNITED STATES OF AMERICA

v.

HOWARD PIERCE
JONATHAN REVELS

)
)
) INDICTMENT
)
)
)

The Grand Jury charges that:

COUNT ONE

On or about December 9, 2015, in the Eastern District of North Carolina, the defendant, HOWARD PIERCE, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm, and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT TWO

On or about September 4, 2016, in the Eastern District of North Carolina, the defendant, HOWARD PIERCE, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm, and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT THREE

On or about September 4, 2016, in the Eastern District of North Carolina, the defendant, JONATHAN REVELS, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed firearms, and the firearms were in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

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FORFEITURE NOTICE

The defendant is hereby given notice that all of the defendant's interest in all property specified herein is subject to forfeiture.

Upon conviction of any of the offense(s) set forth in Counts One through Three, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), as made applicable by Title 28, United States Code, Section 2461(c), any and all firearms or ammunition that were involved in or used in a knowing commission of the said offense(s).

The forfeitable property includes, but is not limited to, the following:

- (1) Savage Model 116, .270 rifle, bearing serial number F348394
- (2) Browning Gold Hunter, 12 gauge shotgun, bearing serial number 113MZ20370
- (3) Mossberg 500a, 12 gauge shotgun, bearing serial number R554622
- (4) Browning Magnum 12 gauge shotgun, bearing serial number 18666NW151

If any of the property described above, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28,

United States Code, Section 2461(c).

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

2/11/2020
DATE

ROBERT J. HIGDON, Jr.
United States Attorney

BY: 
CHAD E. RHOADES
Assistant United States Attorney